

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA, *ex rel.*
JULIE LONG,

Plaintiffs,

v.

JANSSEN BIOTECH, INC.,

Defendant.

Civil Action No. 16-CV-12182-FDS

**JOINT MOTION FOR EXTENSION/MODIFICATION OF PHASE ONE EXPERT
DEADLINES**

Pursuant to Rule 16 of the Federal Rules of Civil Procedure and Local Rule 16.1, and for the reasons set forth in the accompanying Memorandum of Law in support of this Motion, Plaintiff-Relator Julie Long and Defendant Janssen Biotech, Inc. jointly request that the Court extend and modify the deadlines for the Rule 30(b)(6) deposition of Janssen and Phase One expert disclosures and discovery as follows:

- The 30(b)(6) deposition of Janssen shall be **completed by May 20, 2025**.
- Relator shall designate her experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) **within 45 days of May 20, 2025**.
- If Defendant intends to call any trial experts, Defendant shall designate such experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) **within 75 days of the deadline for Relator's disclosures**.
- If Relator intends to call any trial experts in rebuttal to Defendant's experts' opinions, Relator shall designate such experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) **within 45 days of the deadline for Defendant's disclosures**.
- Any such experts disclosed by Relator and Defendant shall be deposed **within 60 days of the last occurring event above**.

- The parties reserve their rights to make discovery motions and seek reconsideration of this schedule for good cause in light of the First Circuit's ruling in *Regeneron* and the outcome of the Court's *in camera* review that is the subject of the Court's March 21, 2025 ruling, ECF No. 470.

Dated: April 1, 2025

/s/ Jason C. Raofield

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CERTIFICATE OF SERVICE

I hereby certify on this 1st day of April, 2025, that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Jason C. Raofield

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